



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

February 14, 2025

**BY ECF**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*So ordered  
2-18-25  
AK Hellerstein*

**Re: *United States v. Morrow-Wu, et al.*, 23 Cr. 90 (AKH)**

Dear Judge Hellerstein:

The Government respectfully writes to request a six-day adjournment of the pre-trial deadline for expert and Rule 404(b) notices to be provided, which is currently scheduled for February 18, 2025.

On February 13, 2025, counsel for Matthew Morrow-Wu filed a letter seeking to adjourn the March 24, 2025 trial date to a date in the fall of 2025, to which the Government and counsel for Shangzhen Wu took no position. On February 14, 2025, the Court issued an order directing the parties to appear for a status conference on February 20, 2025. Based on the possibility that the trial date in this matter may be adjourned following the February 20, 2025 conference, the Government respectfully requests that the Court extend the pretrial deadline for expert and Rule 404(b) notices to February 24, 2025. The requested six-day adjournment would not affect the other pretrial deadlines or trial date currently set by the court. Defendant Matthew Morrow-Wu consents to this request, while defendant Shangzhen Wu opposes the request.

Respectfully submitted,

MATTHEW PODOLSKY  
Acting United States Attorney

By: /s/  
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cc: Defense Counsel (by ECF)